

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
<hr/> THIS DOCUMENT RELATES TO:	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
ALL WAVE 8 CASES	

**PLAINTIFFS’ MOTION TO STRIKE DEFENDANTS’
OBJECTIONS AND RESPONSES TO PLAINTIFFS’
“NOTICE TO TAKE DEPOSITION OF DEBRA FROMER, M.D.”**

Plaintiffs move the Court to strike Ethicon’s untimely filed Objections and Responses to Plaintiffs’ “Notice to Take Deposition of Debra Fromer, M.D.” filed September 19, 2018 (document number 6673).

ARGUMENT

Plaintiffs filed their Notice to Take Deposition of Defense Expert Debra Fromer, MD on September 12, 2018 (document number 6636). The deposition was set for September 18, 2018. Defendants filed their Objections and Responses to Plaintiffs’ deposition notice on September 19, 2018, the day after Dr. Fromer’s deposition had already taken place. Defendants should not be permitted to file objections to the deposition notice after the deposition has already taken place and, as such, Plaintiffs respectfully request that the Court enter an order striking Defendants’ untimely Objections and Responses to Plaintiffs’ “Notice to Take Deposition of Debra Fromer, M.D.”

Dated: September 20, 2018

Respectfully submitted,

/s/ D. Renee Baggett

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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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